

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_)  
CIMC RAFFLES OFFSHORE (SINGAPORE) )  
LIMITED AND YANTAI CIMC RAFFLES )  
OFFSHORE LIMITED, )

Petitioners, )

v. )

SCHAHIN HOLDING S.A., SCHAHIN )  
ENGENHARIA S.A., SEA BISCUIT )  
INTERNATIONAL INC., BLACK GOLD )  
DRILLING LLC, BAERFIELD DRILLING )  
LLC AND SORATU DRILLING LLC, )

Respondents. )  
\_\_\_\_\_)

13 Civ. 0052 (JSR)  
ECF Case

**SUPPLEMENTAL DECLARATION OF NWAMAKA G. EJEBE IN SUPPORT  
OF THE PETITIONERS' MEMORANDUM OF LAW IN SUPPORT OF THE  
PETITION TO CONFIRM ARBITRATION AWARD**

I, Nwamaka G. Ejebe, declare as follows:

1. I am a member of the law firm of Debevoise & Plimpton LLP, counsel to CIMC Raffles Offshore (Singapore) Limited and Yantai CIMC Raffles Offshore Limited (collectively, "CIMC Raffles"). I am fully familiar with the facts and circumstances underlying this action based on personal knowledge and a review of the files in my possession.

2. On January 2, 2013, David W. Rivkin made a declaration before the Court in support of CIMC Raffles' Petition to Confirm A Foreign Arbitration Award. In that

Declaration, Mr. Rivkin attached a true and correct copy of the Arbitration Award transmitted to the Parties on December 28, 2012.

3. Since January 2, 2013, the Arbitral Tribunal has made two clerical changes to the Arbitration Award. The Tribunal placed all of the arbitrators' signatures on one page and provided a notarization for one of the arbitrator's signatures.

4. Attached to this Supplemental Declaration as Exhibit 1 is a true and correct copy of the corrected Arbitration Award along with a certification of the document by the International Centre for Dispute Resolution.

5. On February 12, 2013, the Arbitral Tribunal transmitted to the Parties a Disposition of Application for Interpretation or Correction of Final Award of Arbitrators, which added additional clarity to Respondents' obligations under Paragraph 81(2) of the Arbitration Award by adding the phrase "jointly and severally liable."

6. Attached to this Supplemental Declaration as Exhibit 2 is a true and correct copy of the Arbitral Tribunal's Disposition of Application for Interpretation or Correction of Final Award of Arbitrators along with a certification of the document by the International Centre for Dispute Resolution.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 14, 2013.



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Nwamaka G. Ejebe